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MEMO ENDORSED

July 6, 2023

Honorable Valerie E. Caproni
United States District Court
40 Foley Square
New York, New York
VIA ECF

Re: United States v. Joel Cosme Figueroa, et al.
Indictment No. 22 CR 582 (VEC)

Your Honor:

Counsel and the Government are actively in discussions seeking a resolve in this matter. To that end, all join in the application to adjourn the current motion schedule for thirty days.

The new schedule if necessary will be defense motions due August 7, 2023;
Government opposition by September 7, 2023 and reply by September 21, 2023.

Our last discussion concluded last evening at 5:30 p.m.

Most respectfully,

Stacey Richman

cc:

AUSA Jane Y. Chong via ECF
AUSA Matthew R. Shahabian via ECF
Alan Seidler
Jeffrey Pittell

Pretrial motions in this matter are due on **July 21, 2023**. The Government's opposition to any motions is due by **August 4, 2023**, and the Defendants' replies are due by **August 18, 2023**. Motions *in limine* are due by **September 1, 2023**, and any responses are due by **September 15, 2023**. Defendants are encouraged to file their motions jointly to the extent possible.

SO ORDERED.

Valerie Caproni
07/06/2023

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE